

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

BRIAN D. PIERCE,

Plaintiff,

vs.

PENNSYLVANIA DEPT. OF
CORRECTIONS,

Defendant,

: CIVIL ACTION NO.03-173E

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: Hon. Sean L. McLaughlin
: Magistrate Judge Susan
: Paradise Baxter

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**PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION FOR
SUMMARY JUDGMENT**

Plaintiff, Brian Pierce, hereby opposes the Defendant's Motion for Summary Judgment which was made pursuant to Rule 56 of the Federal Rules of Civil Procedure as there are genuine issues of material fact as to each of the issues raised by the Defendant. In support of this opposition, Plaintiff has filed herewith Plaintiff's Brief in Opposition to Defendant's Motion for Summary Judgment and the Exhibits thereto.

Respectfully submitted,

LAW OFFICES OF NEAL A. SANDERS

Dated: September 9, 2005

By: 

Neal A. Sanders, Esquire
Counsel for Plaintiff

LAW OFFICES OF NEAL A. SANDERS
1924 North Main Street Ext.
Butler, Pennsylvania 16001

(724) 282-7771
PA ID No. 54618

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 9th day of September, 2005, a true and correct copy of the foregoing **Plaintiff's Opposition to Defendant's Motion for Summary Judgment**, was mailed by the United States First Class Mail, postage prepaid, to the following:

Craig Maravich, Esquire
Office of Attorney General
Commonwealth of Pennsylvania
564 Forbes Avenue
Manor Complex
Pittsburgh, Pennsylvania 15219

Dated: September 9, 2005

By: 

Neal A. Sanders, Esquire
Counsel for Plaintiff,
Brian Pierce

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